

February 1, 2018

Mr. Doug Benevento  
Regional Administrator  
USEPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202

Subject: Comments on "Draft Sampling and Analysis Plan Interior Dust Sampling of Anaconda Schools"

CDM Federal Programs Corp for U.S. Environmental Protection Agency, January 10, 2018

Dear Mr. Benevento:

Thank you for the opportunity to review and comment on EPA's proposed interior dust sampling plan for Anaconda's public schools. While we appreciate the agency's effort in developing a plan to evaluate the potential presence of lead and arsenic contamination in our schools, the plan as written fails to address a number of key issues and areas of concern.

The draft plan calls for sampling interior dust in classrooms and other areas that are routinely cleaned five days a week. This approach does not attempt to locate smelter dust that may have migrated into the schools prior to 1977, nor does it adequately address ongoing contamination potential from soils migrating into the schools. By focusing on these areas and sampling in the timeframe suggested, the County believes that the results will be biased against finding contamination.

The draft plan does not call for sampling attics, crawlspaces, areas above dropped ceilings, in the heating, ventilating and cooling (HVAC) systems of each school, or in other areas that are not routinely cleaned, but where smelter dust is likely present. Further, the sampling is proposed to take place in late March of 2018 during Spring Break when the ground will likely still be frozen and/or snow covered, and therefore very little dust from the outdoors will be generated and potentially captured on the interior floor mats as inferred in the plan. USEPA's own "Guidance for the Sampling and Analysis of Lead in Indoor Residential Dust" publication (OSWER 9285.7-81; December 2008), which is applicable to the subject sampling and analysis

plan, states: *"It is recommended that house dust samples be taken during the late summer months to early fall, in order to capture peak house dust lead concentrations and loadings potentially responsible for peak PbB (blood lead) concentrations reported in numerous studies."* The County believes that this recommendation applies to schools as well when exposed soils have a greater likelihood of migrating into the schools' indoor environment through open doors and windows. However, the areas excluded from sampling as described above can and should be sampled during the 2018 Spring Break period as a first step in comprehensively evaluating potential dust contamination in our schools. Surface sampling can follow thereafter (Step 2) and should be scheduled for the September 2018 timeframe.

It is our belief that USEPA is genuinely interested in definitively identifying the presence or absence of lead and arsenic dust in our Anaconda public schools. Further we believe that EPA desires to insure that adequate remedy occurs if contamination is found, as well as, protect Anaconda's school children and staff from contaminated dust, if present.


We respectfully urge your agency to carefully reexamine the proposed sampling and analysis plan and modify it per our request in the following manner:

- ✓ All attic, crawl space and dropped ceiling access points must be sampled, and sampled well beyond the entrance points in order to get representative samples of these areas.
- ✓ All HVAC components including, but not limited to, supply and return ductwork, filters, condensate pans, and heat exchangers must be examined and sampled at all access points as may be present in classrooms, hallways and maintenance areas, regardless of whether or not these systems are currently operational.
- ✓ Sampling crews must remove light fixtures and other fixture mounts in classrooms in order to access and sample areas where contaminated dust may be deposited.
- ✓ Ambient air quality in the schools' indoor environments must be sampled, both with personal air monitors (for maintenance personnel) and stationary room monitors (low-volume air samplers operated during normal school hours). Sampling devices must be able to measure particles at the PM 2.5 and PM 10 levels as exposure to contaminated dust less than PM 250 represents the particle sizes of concern.
- ✓ Collect surface samples and sample floor mats as proposed later in the year when exposed soils from the outdoor environment have the greatest potential for ingress to the schools through open doors and windows. This should be coordinated with school maintenance staff to insure surfaces to be sampled are not cleaned in advance of sampling.
- ✓ Sampling of surfaces as described in the draft plan should be performed during the driest time of the year in order to accurately measure any potential dust issues, preferably in September. Again, coordination with school maintenance staff is recommended.

- ✓ If arsenic and lead contamination is present anywhere in these school buildings, it needs to be removed, regardless of whether there is an exposure pathway, and regardless of the levels.

In advance I take this opportunity to thank you for addressing these concerns and I look forward to hearing from you regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bill Everett", with a long horizontal line extending to the right.

Bill Everett  
CEO, Anaconda-Deer Lodge County